

Elena Fast, Esq. Tel (212) 729-9494 elena@fastlawpc.com

521 Fifth Avenue, 17 Floor New York, NY 10175

March 19, 2024

Via ECF

MEMO ENDORSED

Hon. Judge Laura Taylor Swain U.S. District Court Judge Southern District of New York United States Courthouse 500 Pearl Street New York, NY 10007

Re: <u>United States v. Jesus Alberto Bautista Suero</u>

23 CR 279

Dear Judge Swain:

I represent Mr. Bautista Suero on the above captioned matter. I write with the consent of the Government and Pre-Trial to respectfully request a modification in Mr. Suero's conditions of release.

Presently, Mr. Bautista Suero's conditions of release limit his travel to EDNY and SDNY. Pre-Trial Officer Ashley Cosme informed me that Mr. Bautista Suero may have an open criminal case in Pennsylvania, which may require case-related travel for court appearances and/or retrieval of property seized by the Bethlehem Township Police Department.

As such, I am respectfully seeking that the conditions of Mr. Bautista Suero's release be expanded to include travel to Pennsylvania for court-related purposes only. Both Pre-Trial Officer Ashley Cosme and AUSA Ni Qian have no objection to this request.

Thank you for your time and consideration of this request.

Respectfully Submitted,

s/ Elena Fast

Elena Fast, Esq.

Counsel for Jesus Alberto Bautista Suero

The foregoing request is granted. DE 144 resolved. SO ORDERED. 3/20/2024 /s/ Laura Taylor Swain, Chief USDJ

cc: all counsel of record via ECF